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Subject: Summary of R6 RRT Call today at 1530 hrs
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EPA convened the R6 RRT to discuss the Dispersant Monitoring and Assessment Directive - Addendum 2 signed last night by EPA and USCG and issues related to its implementation.

Surface Application

The EPA Co-Chair inquired as what SMART data was showing in regard to surface application of dispersants. The USCG Co-Chair and NOAA representative stated they had seen no compelling evidence surface application was ineffective. They did remind RRT members that weather plays a significant role in the effectiveness and so effectiveness does vary by application. The USCG and NOAA did say they had some concerns about the ability of some spotters to reliably assess dispersant effectiveness. As a result NOAA SSC Ed Levine conducted a half day training last week for spotters.

Evaluation of Dispersant Toxicity

The EPA Co-Chair asked how the toxicity of dispersants had been evaluated by Unified Command in the selection of a dispersant. The USCG Co-Chair was concerned about potential USCG liability if the USCG essentially directs a responsible party not use a product EPA has placed on the Subpart J list. The NOAA representative expressed concern because he felt most listed dispersants had only limited lab data to support their toxicity values whereas there was a much larger body of historical data to characterize the potential effects of Corexit.. He went to say that because of this Corexit is probably the only dispersant that NOAA could potentially connect to toxicity effects in marine animals. The NOAA representative and the EPA Region 6 NOAA representative currently serving in Robert reiterated that NOAA was conducting extensive sampling of water chemistry, the water column, animal tissues, etc. that would address toxicity concerns through the NRDA process.

Directive Compliance

The FOSC will report out to the RRT on the effectiveness and monitoring of surface and subsurface dispersant application and on the documentation BP will be providing to the FOSC and EPA RRT Co-Chair to document compliance with the directives. This will be scheduled in the near future once the FOSC has had the opportunity to discuss reporting with BP.

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